UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

NEW HAMPSHIRE YOUTH MOVEMENT,
 	
    Plaintiff,
 	
    v.
 	
 DAVID M. SCANLAN, in his official capacity
 as New Hampshire Secretary of State,
 	
    Defendant.
	Case No. 1:24-cv-00291-SE-TSM

DEFENDANT SECRETARY OF STATE SCANLAN'S
ASSENTED-TO MOTION TO EXTEND TIME & EXCEED PAGE LIMIT

NOW COMES Defendant David M. Scanlan, in his official capacity as New Hampshire Secretary of State, by and through counsel, the Office of the Attorney General, and moves to extend time to file his Motion to Dismiss Plaintiff New Hampshire Youth Movement's First Amended Complaint (ECF No. 50) and to exceed the page limit for his forthcoming Motion to Dismiss, and states as follows:

1.   On March 18, 2025, New Hampshire Youth Movement filed its First Amended Complaint. ECF No. 50.

2.   The Secretary's responsive pleading is due on or before April 8, 2025. ECF No. 51 at 3.

3.   Given the scope, breadth, and importance of the issues in this case, and given undersigned counsel's existing caseload and the confluence of several deadlines in other state and federal lawsuits, Defendant asks for additional time to file his Motion to Dismiss the First Amended Complaint.

4.   Accordingly, the Secretary respectfully requests that the Court extend the deadline to file his Motion to Dismiss by 7 days, to April 15, 2025.

5.   Also, Rule 7.1(a)(3) of the Local Rules for the United States District Court for the District of New Hampshire limits the Secretary's Motion to Dismiss to 25 pages. LR 7.1(a)(3).

6.   Among other things, the 82-paragraph First Amended Complaint asserts factual allegations and legal theories related to five Youth Movement members. *See* ECF No. 50, ¶¶ 19-27. Given the scope of the allegations and the importance of the constitutional issues raised in the First Amended Complaint, Defendant asks for this Court's leave to file in excess of the 25-page limit.

7.   Accordingly, Defendant respectfully requests that the Court permit him to file a Motion to Dismiss not to exceed 40 pages, and to grant Youth Movement reciprocal leave to file its anticipated objection or opposition to the Secretary's Motion to Dismiss, not to exceed 40 pages.

8.   Plaintiff assents to Defendant's requested deadline extension and requested increase in the page limits of Defendants' forthcoming Motion to Dismiss and Plaintiff's anticipated objection or opposition to the Motion to Dismiss.

9.   <u>Local Rule 7.1(a)(2)</u>: Due to the nature of the relief requested, no memorandum of law is required.

10.   <u>Local Rule 7.2(a)</u>: Neither this Motion nor its requested relief will result in the continuance of any currently scheduled trial or hearing, nor will it require the extension of any other deadline set forth in the parties' Joint Discovery Plan (ECF No. 51). Civil Form 3 is attached to this Motion.

Prayer for Relief

WHEREFORE, Secretary Scanlan respectfully requests that this Honorable Court:

A.   Grant this Assented-To Motion to Extend Time & Exceed Page Limit;

B.   Allow the Secretary to file his Motion to Dismiss on or before April 15, 2025;

C.   Allow the Secretary to file a Motion to Dismiss not to exceed 40 pages;

D.   Allow Youth Movement to file its objection or opposition to the Secretary's Motion to Dismiss not to exceed 40 pages; and

E.   Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANT DAVID M. SCANLAN, in his official capacity as New Hampshire Secretary of State

By his attorney,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: April 5, 2025

/s/ Michael P. DeGrandis
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis
Michael P. DeGrandis

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